

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and) Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)
) Honorable Aleta A. Trauger
Plaintiff,)
) LEAD PLAINTIFF'S MOTION FOR CLASS
vs.)
) CERTIFICATION, APPOINTMENT OF
CORRECTIONS CORPORATION OF)
AMERICA, et al.,) CLASS REPRESENTATIVE AND
) APPOINTMENT OF CLASS COUNSEL
)
Defendants.)
)
)

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Amalgamated Bank”) hereby moves this Court for an Order certifying this matter as a class action pursuant to Rule 23(a) and (b)(3) of the Federal Rules of Civil Procedure, appointing Lead Plaintiff as Class Representative and approving its selection of Robbins Geller Rudman & Dowd LLP as Class Counsel. This motion is supported by the memorandum of law, the Declarations of Christopher M. Wood and Eleanor Innes, the Report on Market Efficiency by Professor Steven P. Feinstein., CFA, the exhibits to those documents and such other evidence and argument as the Court may consider.

DATED: June 1, 2018

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CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 1, 2018.

s/ Christopher M. Wood
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Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al

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